

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi @jsitel.com

June 26, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2015 ETC Annual Report of Trenton Telephone Company

Study Area Code 220389

Dear Ms. Dortch:

On behalf of Trenton Telephone Company ("Trenton"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Trenton seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2015 ETC Annual Report of Trenton Telephone Company

Study Area Code 220389 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Trenton Telephone Company ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- 2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5*, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

Ish Klandell

FCC Form 481 - Carrier Annual Reporting

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819

	Data Collection Form	CTED FOR PUBLIC	INSPECTION	July 2013		
<010>	Study Area Code	220389				
<015>	Study Area Name	TRENTON TEL CO				
<020>		2016				
	Program Year Contact Name: Person USAC should contact					
<u> </u>	with questions about this data	Adam Austin				
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7063982900 ext.				
<039>	Contact Email Address: Email of the person identified in data line <030>	adam@tvn.net				
ANNUA	AL REPORTING FOR ALL CARRIERS				54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting		(complete attached worl	ksheet)	(check box whe	n complete)
	Outage Reporting (voice)		(complete attached worl			✓
<210>		o outages to report	(complete attached work	issincety		
<300>	Unfulfilled Service Requests (voice)				V	
					- I	
<310>	Detail on Attempts (voice)					
				(attach descriptive de	ocument)	
<320>	Unfulfilled Service Requests (broadband)				✓	111111.
	· ` ` 			7		
<330>	Detail on Attempts (broadband)					
				(attach descriptive o	aocument)	
<400>	Number of Complaints per 1,000 customers (voice)					
<410>	Fixed 0.0				/	1
<420>	Mobile 0.0					<u> </u>
<430>	Number of Complaints per 1,000 customers (broad	oand)			√	
<440>	Fixed 0.0					
<450>	Mobile 0.0					
<500>	Service Quality Standards & Consumer Protection R	uies Compliance	(check to indicate certif	fication)	✓	/
	220389ga510.pdf					
<510>			(attached descriptive	document)	✓	✓
<600>	Functionality in Emergency Situations		(check to indicate certif	fication)		
.000	220389GA610.pdf			reaction,	<u> </u>	
			(attached descriptive do	cument)	✓	✓
<610>						
	Company Price Offerings (voice)		(complete attached wor		—	
<710>	Company Price Offerings (broadband)		(complete attached wo	rksheet)		
<800>	Operating Companies and Affiliates		(complete attached wor			11111
	Tribal Land Offerings (Y/N)?	_	yes, complete attached wor	rksheet)		
<1000>	Voice Services Rate Comparability Certification	<u> </u>	es			*****
<1010>	•		(attach descriptive doc	cument)		
<1100>	Certify whether terrestrial backhaul options exist (res or No)	(if not, check to indica	te certification)	√	
<1110>			(complete attached wo	rksheet)		
<1200>	Terms and Condition for Lifeline Customers		(complete attached wo	rksheet)		✓
	Price Cap Carriers, Proceed to Price Cap Additional	Documentation Works	sheet			
-2000	Including Rate-of-Return Carriers affiliated with Pr	ice Cap Local Exchange			П	
<2000> <2005>			(check to indicate certificate) (complete attached wor			
~2003/	Rate of Return Carriers, Proceed to ROR Additional	Documentation Work		Nonecti		
<3000>		January Tronk	(check to indicate certifi	ication)	✓	
<3005>			(complete attached wor	rksheet)	✓	

(100)	onitation On the Company Donough		100 Feb. 2004
Data Co	(Lto) service Quanty improvement reporting Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220389	
<015>	Study Area Name	TRENTON TEL CO	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin	
<032>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net	
<110>	Has your company received its ETC certification from the FCC?	(yes/no)	
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?) (ou / sə/)	00
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.		220389ga112.pdf
			Name of Attached Document
	Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	n year	
<113>	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received		Yes Yes
<115> <116> <117>	How much (USF) was used to improve service quality and how support was used to improve service quality How much (USF) was used to improve service coverage and how support was used to improve service coverage. How much (USF) was used to improve service capacity and how support was used to improve service capacity.		Yes Yes Yes
<ti></ti>	Provide an explanation of network improvement targets not met in the prior calendar year.		Not Applicable

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<015> Study Area Name											
	ea Name				TRENTON TEL CO	CO					
<020> Program Year	Year				2016						
<030> Contact N	Contact Name - Person USAC should contact regarding this data	C should contac	tregarding this	data	Adam Austin						
<035> Contact T	Contact Telephone Number - Number of person identified in data line	- Number of pe	rson identified	in data line <030>	30> 7063982900 ext.	ext.					
<039> Contact E	Contact Email Address - Email Address of person identified in data line	ail Address of pe	rson identified	in data line <0	<030> adam@tvn.net	ļ.					
<220> <a>	 b1>	 b2>	 63>	 b4>	<c1></c1>	<c2></c2>	\$ V	\ \ \ \	\$	\ \	<u>\$</u>
Red P	e	Outage Start Outage Start Date Time	no	Outage End Time	Number of Customers Affected	Total	911 Facilities Affected	Service Outage Description (Check	Did This Outage Affect Multiple Study Areas	Service Outage	Preventative
							(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures

(700) Pri Data Col	(700) Price Offerings in Data Collection Form	(700) Price Ornerings including Voice Kate Data Data Collection Form	Jata				7. 10 uL	FCC FORM 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	3 Control No. 3060-0819
<010>	Study Area Code	nde			220389				
<015>	Study Area Name	ıme			TRENTON TEL	L CO			
<020>	Program Year				2016				
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	contact regard	ing this data	Adam Austin	и			
<032>		Contact Telephone Number - Number of person identified in data line <030>	er of person ide	ntified in data line <	:030> 7063982900 ext.	ext.			
<039>		Contact Email Address - Email Address of person identified in data line <030>	ss of person ide	entified in data line	<030> adam@tvn.net	ət			
<701>		Residential Local Service Charge Effective Date	ctive Date	1/1	1/1/2015				
<702>		Single State-wide Residential Local Service Charge	ervice Charge						
<703>	<a1></a1>	<a2></a2>	<a3></a3>	 	<62>	<	 b4>	<	\$
	L	Exchange (II EC)	SAC (CETC)	Rate Type	Residential Local	State Subscriber Line Charge	State Iniversal Service Fee	nded Area	Total ner line Rates and Fees
	9,816	רעכוומוופב (ודרכ)	345 (25.15)	ade i Abe	Selvice hate	State Substilled Line Charge	State Offiversal Selvice ree		otal per mie nates and rees
					d				
					See a	See attached worksheet			

(710) Bro	(710) Broadband Price Offerings	FCC Form 481
Data Coll	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	<010> Study Area Code	220389
<015>	<015> Study Area Name	TRENTON TEL CO
<020>	<020> Program Year	2016
<030>	<030> Contact Name - Person USAC should contact regarding this data	Adam Austin
<032>	<035> Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.

Adam Austin 7063982900 ext. adam@tvn.net

<039> Contact Email Address - Email Address of person identified in data line <030>

_												
<d4>></d4>	Usage Allowance Action Taken When Limit Reached (<i>select</i>)											
<q3></q3>	Usage Allowance (GB)											
<d2>></d2>	Broadband Service - Upload Speed (Mbps)											
<d1>></d1>	Broadband Service - Download Speed (Mbps)											
<>>>	Total Rate and Fees				had							
<	State Regulated Fees				See attac	workshoot	WOINSIIGGE					
 b1>	Residential Rate					•						
<a2></a2>	Exchange (ILEC)											
<a1>></a1>	State											
<711>		 										

(800) Operating Companies			FCC Form 481
Data Collection Form			OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	220389		
Study Area Name	TRENTON TEL CO		
<020> Program Year	2016		
- Person USAC should contact regarding this data	Adam Austin		
<035> Contact Telephone Number - Number of person identified in data line <030> 7	7063982900 ext.		
<039> Contact Email Address - Email Address of person identified in data line <030> a	adam@tvn.net		
<810> Reporting Carrier Trenton Telephone Company			
Operating Company			
<813> <a1></a1>	<a>>	٨	<a3></a3>
Affiliates	SAC		Doing Business As Company or Brand Designation
	_		

(900) Tribal Lands Reporting Data Collection Form	PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	220389
	TRENTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Adam Austin
<035> Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	• adam@tvn.net
<910> Tribal Land(s) on which ETC Serves	
<920> Tribal Government Engagement Obligation	
	Name of Attached Document
If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to \$ 54.313(a)(9) includes: <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions. <922> Feasibility and sustainability planning; <923> Marketing services in a culturally sensitive manner; <924> Compliance with Land Use permitting requirements <925> Compliance with Environmental Review processes <927> Compliance with Cultural Preservation review processes <928> Compliance with Tribal Business and Licensing requirements.	Select Yes or No or Not Applicable

(1100)	(1100) No Terrestrial Backhaul Reporting	FCC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year 2016	
<030>	Contact Name - Person USAC should contact regarding this data	stin
<032>	ied in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030> adam@tvn.net	n.net
V1120 ×	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No). Please select the appropriate response (Yes, No, Not Applicable) to confirm the	
11305	reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	

- (0000)			
(1200) 16	(1200) Terms and Condition for Lifeline Customers	FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	6
Data Coll	Data Collection Form	July 2013	
7010	(+1,1,4), Aron Codo		
VOTO/	Study Alea Code	220369	
<0T0>	Study Area Name	TRENTON TEL CO	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin	
<032>	Contact Telephone Number - Number of person identified in data line <030>		
<039>	Contact Email Address - Email Address of person identified in data line <030>	<030> adam@tvn.net	
		220389GA1210.pdf	
<1210>	<1210> Terms & Conditions of Voice Telephony Lifeline Plans		
		Name of Attached Document]
<1220>	Link to Public Website	НТТР	
"Please c or the we	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to		
§ 54.422(a)(2) a annually report:	§ 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,		
<1222>	Details on the number of minutes provided as part of the plan, $oxed{ begin{tabular}{c} \end{tabular}}$		
<1223>	Additional charges for toll calls, and rates for each such plan.		

(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0986/OMB Control No. 3060-0989
Including Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers	July 2013
<010> Study Area Code	
<015> Study Area Name 220389	
<020> Program Year TRENTOR	TRENTON TEL CO
<030> Contact Name - Person USAC should contact regarding this data	
<035> Contact Telephone Number - Number of person identified in data line <030> Adam Austin	SELT.
7020. Contact Empi Address Empi Address of source in incontinuous in data line 7020.	/U6398Z9UU EXC.

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

		Name of Attached Document(s) Listing Required Information				ed information ames, and ce in the		Name of Attached Document(s) Listing Required Information
Incremental Connect America Phase I reporting 2 nd Year Certification (47 CFR § 54.313(b)(1)i} 3> 3rd Year Certification (47 CFR § 54.313(b)(1)ii}	>> Attachment {47 CFR § 54.313(b)(1)ii}		Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)} > 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)} > 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)} > 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)} > 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} > Certification Support Used to Build Broadband	Connect America Phase II Reporting {47 CFR § 54.313(e)} > 3rd year Broadband Service Certification >> 5th year Broadband Service Certification >> Interim Progress Certification	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	> Interim Progress Community Anchor Institutions	
<2010> <2011a>	<2011b>		<2012> <2013> <2014> <2015>	<2016>	<2017> <2018> <2019>	<2020>	<2021>	

(3000) Rate Of Return Carrier Additional Documentation	
(3000) Rate Of Return Carrier Additional Documentation	
	FCC Form 481
Data Collection Form OMB Control No	OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013	July 2013

5	Study Area Code	0000000
<0.15>		ZZUSUS TRENTON TEL CO
<020>		
<030>	Contact Name - Person USAC should conta	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
1000	ш	auamon VII. 115 t
CHECK	the boxes below to note compliance on its five year service quality plan (pursua CFR § 54.313(f)(2). I further certify that t	CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.
		220389GA3010.pdf
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313($\beta(1)(i)$)	
		Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	9012 contains the required information pursuant to esses of community anchor institutions to which began
		220389ga3012.pdf
(3012)	Community Anchor Institutions [47 CFR § 54.313{f}](1)[ii]}	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No) (Yes/No)
Please	scheck these boxes to confirm that the attached document(s), on line 301	check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	Ish Hows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
(3018)	If the response is no on line 3014. Is vour company audited?	Name of Attached Document Listing Required Information ((Yes/No)
	orde 0000 only no post of programmes of the	
(3019)	in the response is yes on line souts, prease check the boxes below to confirm the south of the s	
		offinial comparable to ros operating report for recommunitations.
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	ublic accountant that performed the company's financial audit
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(β (2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Arrowses.	
(3023)		
(3024)	_	ash Flows
(3026)	Attack the worksheef listing required information	Zzuskogasuze.par
		Name of Attached Document Listing Required Information

Name of Attached Document Listing Required Information

Page 12

REDACTED FOR PUBLIC INSPECTION	FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013	
	(3000) Rate Of Return Carrier Additional Documentation (Continued)	Data Collection Form		

220389	TRENTON TEL CO	2016	Adam Austin	7063982900 ext.	adam@tvn.net
Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Nu	Contact Email Address - Email Address of person identified in data line <030> adam@tvn.net
<010>	<015>	<020>	<030>	<032>	<039>

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

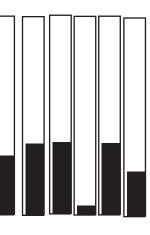
(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets (3032) Total Debt

(3033) Total Equity

(3034) Dividends



Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
	July 2013

<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

	tion - Agent / Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220389
<015>	Study Area Name	TRENTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Adam Austin
<035>	Contact Telephone Number - Number of person identified in data line <030>	7063982900 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adam@tvn.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File An	nual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I certify that (Name of Agent) <u>John Staurulakis</u> , <u>Inc</u> also certify that I am an officer of the reporting carrier; my responsibilities include ens agent; and, to the best of my knowledge, the reports and data provided to the authoriz	uring the accuracy of the annual data reporting requirements provided to the authorized
Name of Authorized Agent: John Staurulakis, Inc	
Name of Reporting Carrier: TRENTON TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/26/2015
Printed name of Authorized Officer: Steven Tatum	
Title or position of Authorized Officer: 1st VP	
Telephone number of Authorized Officer: 7066574367 ext.	
Study Area Code of Reporting Carrier: 220389 Filing Due	Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under Title 18 of the United S	, , , , , , ,

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
s agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.
me of Reporting Carrier: TRENTON TEL CO
me of Authorized Agent or Employee of Agent: John Staurulakis, Inc.
nature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/26/2015
nted name of Authorized Agent or Employee of Agent: Bob Ragsdale
e or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs
ephone number of Authorized Agent or Employee of Agent: 7705692105 ext.
dy Area Code of Reporting Carrier: 220389 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

The Trenton Telephone Company's demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

Trenton Telephone Company. Inc. ("Trenton") hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Trenton is subject to consumer protection obligations under Georgia state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Rules of the Georgia Public Service Commission which discloses rates, and terms and conditions of service to customers

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

(Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules of the Georgia Public Service Commission); (2) adherence to state consumer protection requirements governing telephone providers which require Service Standards (Chapter 515-12-1-.17 and .18 of the Rules of the Georgia Public Service Commission); Customer Billing (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission; and Customer Complaints (Chapter 515-12-1-.08 of the Rules of the Georgia Public Service Commission); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Trenton Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:

Trenton Telephone Company ("Trenton") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Trenton's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Trenton can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Trenton to manage traffic spikes throughout its network, as emergency situations require. In addition, Trenton has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Trenton has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Trenton has access to fuel.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

Data Col	Data Collection Form	(700) Frice Orienings including voice nate Data Data Collection Form	פופ				O. TO June	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	. Control No. 3060-0819
<010>	Study Area Code	Code			220389				
<015>	Study Area Name	Name			TRENTON TEL	CO			
<020>	Program Year	ear			2016				
<030>		Contact Name - Person USAC should contact regarding this data	contact regardì	ing this data	Adam Austin				
<032>		Contact Telephone Number - Number of person identified in data line <030>	er of person ide	ntified in data line <0	30> 7063982900 ext.	ext.			
<039>		Contact Email Address - Email Address of person identified in data line <030>	ss of person ide	ntified in data line <0	30> adam@tvn.net	et.			
<701>		Residential Local Service Charge Effective Date	ctive Date	1/1/2015	2015				
<702>		Single State-wide Residential Local Service Charge	ervice Charge						
<703>									
	<a1></a1>	<a2></a2>	<a3></a3>	 	 	 	 	<	<>>>
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
	GA	All		FR	19.82	0.0	0.0	0.0	19.82

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

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tudy Are	Study Area Name			TRENTON TEL CO				
Program Year	Year			2016				
ontact N	Contact Name - Person USAC should contact regarding this data	ld contact regarding	this data	Adam Austin				
ontact T	Contact Telephone Number - Number of person identified in data line <030>	ber of person identi	fied in data line <030>	7063982900 ext.				
ontact E	Contact Email Address - Email Address of person identified in data line	ress of person identi	ified in data line <030>	adam@tvn.net				
, ()	<e>></e>	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	<h2></h2>	\$172	<2 <i>μ</i> >	×(μ)>		2002>
ATD.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		⊩	Total Ctot	Colored Colored		IIsage Allowance	Usage Allowance
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	and Fees	Download Speed	Download Speed - Upload Speed (Mbps) (GB)	(GB)	Action Taken
					(Mbps)			When Limit Reached {select}
GA	ALL	49.95	0.0	49.95	3.0	1.0	0.666666	Other, No Usage Limit
GA	ALL	59.95	0.0	59.95	5.0	1.0	0.666666	Other, No Usage Limit
GA	ALL	124.95	0.0	124.95	30.0	30.0	0 66666	Other, No Usage Limit
5	ALL	L C L T		0	0	C	0 0	Other, No Usage Limit
g	b b	154.95	2.	154.95	0.09	0.00	0.00	Other No Heade Limit
GA	Abb	194.95	0.0	194.95	100.0	100.0	999999.0	Ochret, No Osage Dimito
GA	ALL	254.95	0.0	254.95	200.0	200.0	0.666666	Other, No Usage Limit
GA	ALL	354.99	0.0	354.99	300.0	300.0	0.666666	Other, No Usage Limit

Trenton Telephone Company Georgia Public Service Commission

Section C Ninth Revised Sheet 2 Cancels Eighth Revised Sheet 2

BASIC LOCAL EXCHANGE SERVICE

C.1 General

- A. This tariff is governed, except as otherwise specified herein, by the General Rules and Regulations of the Georgia Public Service Commission. Unless otherwise specified, the charges quoted in this tariff are periods of one month, and payable monthly in advance.
- B. The rates specified herein entitle subscribers to access all exchange access lines in the subscriber's county within the same LATA, all exchange access lines bearing the central office designations of the subscriber's exchange.
- C. The rates quoted herein, also entitle the subscriber of these exchanges to call without additional charge, subscribers in other service areas, as outlined below:

Trenton: EAS to Rising Fawn, GA; West Brow, GA; Rossville, GA; Chattanooga, TN; Bryant, AL; Chickamauga, GA; and Flat Rock, AL.

EAS to Trenton, GA; West Brow, GA; Rossville, GA; Chattanooga, TN; Bryant, AL; Chickamauga, GA; and Flat Rock, AL.

West Brow: EAS to Chattanooga, TN; Trenton, GA; Rossville, GA; Rising Fawn, GA; Bryant, Al, Chattanooga, TN; Tunnel Hill, GA; and Flat Rock AL.

C.1 Rates – Touchtone Access Line

Within the base rate area as specified on the attached map, rates for the Trenton Telephone Company Exchanges are as follows:

<u>1PB</u>	<u> 2PB</u>	<u>4PB</u>	ROTARY	1PRFR	2PRFR	4PRFR
33.20	27.50	18.75 (I)	49.05	19.82 (I)	19.82 (I)	18.00 (I)

Information previously found in this Section has been moved to Section Z.

C.3 Maps

Maps which indicate and define the exchange and base rate area limits of the respective exchanges are filed with the Georgia Public Service Commission as part of the Certificate of Public Convenience and Necessity granted by the Commission.

Issued: November 25, 2014 Effective: January 1, 2015 Title: Vice President

Steve Tatum By:

Trenton Telephone Company Georgia Public Service Commission

Section Z Fifth Revised Sheet 15 Cancels Fourth Revised Sheet 15

OBSOLETE SERVICE OFFERINGS

MISCELLANEOUS SERVICES

C.2 Rates – Access Line Only

Within the base rate area as specified on map attached, rate for the Trenton Telephone Company Exchanges are as follow:

<u> 1PB</u>	<u> 2PB</u>	<u>4PB</u>	ROTARY	<u>1PRFR</u>	2PRFR	4PRFR
31.70	$\overline{26.00}$	17.25 (I)	47.55	19.82 (I)	19.82 (I)	16.50 (I)

Issued: November 25, 2015

By: Steve Tatum

Effective: January 1, 2015

Title: Vice President

Trenton Telephone Company

Section C

Georgia Public Service Commission

Second Revised Sheet 4

BASIC LOCAL SERVICE

LIFELINE SERVICE TARIFF

C.5 LOW INCOME PROGRAM

(C)

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below:

1. Lifeline Assistance

a. General

Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network or its functional equivalent; local usage; access to emergency services; and toll limitation.

b. Regulations

Subscribers are eligible for Lifeline Assistance if:

- 1) The subscriber's household income is at or below 135 percent of the Federal Poverty Guidelines, or
- 2) The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

Medicaid:

Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps; Supplemental Security Income (SSI); Federal Public Housing Assistance; Low-Income Home Energy Assistance Program (LIHEAP);

National School Lunch Program's free lunch program; Temporary Assistance for Needy Families (TANF); Low Income Senior Citizens discount plan offered by a local gas or power company

(C)

Issued: July 30, 2012 Effective: June 1, 2012

By: William R. Tatum Title: President

Trenton Telephone Company

Georgia Public Service Commission

Section C Second Revised Sheet 5

BASIC LOCAL SERVICE

LIFELINE SERVICE TARIFF

C.5 LOW INCOME PROGRAM (Cont'd)

(C)

- 1. Lifeline Assistance (Cont'd)
 - b. Regulations (Cont'd)
 - 3) Other eligibility requirements may be established by the Commission
 - 4) Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that s/he receives benefits under a program outlined in sub-paragraphs (a) through (c), above, and must, on that same document, agree to notify the Company if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators.
 - A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.

(C)

Issued: July 30, 2012 Effective: June 1, 2012

By: William R. Tatum Title: President

Trenton Telephone Company

Georgia Public Service Commission

Section C Second Revised Sheet 6

BASIC LOCAL SERVICE

LIFELINE SERVICE TARIFF

C.5 LOW INCOME PROGRAM (Cont'd)

(C)

(C)

- 1. Lifeline Assistance (Cont'd)
 - b. Regulations (Cont'd)
 - Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Company first demonstrates to the Commission that the Company would incur substantial costs, that the Company offers toll limitation without charge, and that telephone subscribership among low-income subscribers in the Company's service area is greater than or equal to the national subscribership rate for low-income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in Georgia. The Company shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Company may reapply for the waiver as necessary.
 - The Company may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available or if the qualifying low-income subscriber elects a calling plan that does not distinguish between toll and non-toll calls in its pricing. If toll blocking is unavailable, then the Company may charge a service deposit.

Issued: July 30, 2012 Effective: June 1, 2012

By: William R. Tatum

Title: President

Trenton Telephone Company Georgia Public Service Commission Section Z Fourth Revised Sheet 15 Cancels Third Revised Sheet 15

OBSOLETE SERVICE OFFERINGS

MISCELLANEOUS SERVICES

C.2 Rates – Access Line Only

Within the base rate area as specified on map attached, rate for the Trenton Telephone Company Exchanges are as follow:

<u> 1PB</u>	<u> 2PB</u>	<u>4PB</u>	ROTARY	<u>1PRFR</u>	<u>2PRFR</u>	<u>4PRFR</u>
31.70	26.00	15.64 (I)	47.55	19.54 (I)	19.19 (I)	14.89 (I)

Issued: November26,2013 Effective: January 1, 2014

By: Steve Tatum Title: Vice President

Trenton Telephone Company (SAC 220389) Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Trenton Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Trenton Telephone Company (SAC 220389

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Trenton Telephone Company provided a list of community anchor institutions to which it provides service in its July, 2014 report and since that time, no new anchor institutions have been served

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026 ATTACHMENT REDACTED IN ENTIRETY